

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re KRISTY L. SANTIAGO** : **CHAPTER 13**  
:   
**Debtor(s)** : **BANKRUPTCY NO. 20-12877**

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Kristy L. Santiago, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by **Wilmington Trust, National Association, et al** on August 9, 2024. Debtors believe they can become current on all post-petition payments due under the April 14, 2021 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young  
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